

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW JASPER AMES,

Defendants.

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Case: 1:24-cr-20018

Judge: Ludington, Thomas L.

MJ: Morris, Patricia T.

Filed: 01-10-2024

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**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**Possession with Intent to Distribute Fentanyl  
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)**

On or about June 14, 2023, in the Eastern District of Michigan, ANDREW JASPER AMES, knowingly possessed with the intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly known as “fentanyl,” a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT TWO**

**Possession of a Firearm in Furtherance of a Drug Trafficking Crime  
18 U.S.C. § 924(c)**

On or about June 14, 2023, in the Eastern District of Michigan, ANDREW JASPER AMES, knowingly possessed a firearm, that is, a Sears, 12 gauge, break-action

shotgun; a Beretta, BU 9 Nano, 9mm semi-automatic pistol; and a Smith & Wesson, Model 79521, .38 special revolver, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute fentanyl; in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT THREE**  
**Felon in Possession of a Firearm**  
**18 U.S.C. § 922(g)(1)**

On or about June 14, 2023, in the Eastern District of Michigan, ANDREW JASPER AMES, knowing that he had been previously convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, that is, a Sears, 12 gauge, break-action shotgun; a Beretta, BU 9 Nano, 9mm semi-automatic pistol; and a Smith & Wesson, Model 79521, .38 special revolver, in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**

The allegations contained in Count One, Two, and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a) and Title 18, United States Code, Section 924(d)(1).

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841, defendant shall forfeit to the United States: (1) any property, real or personal, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and

(2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

Upon conviction of an offense charged in Count Two and Three of this Indictment, defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in said offense including but not limited to a Sears, 12 gauge, break-action shotgun, bearing serial number SC1023733; a Beretta, BU 9 Nano, 9mm semi-automatic pistol, bearing serial number NU068531; and a Smith & Wesson, Model 79521, .38 special revolver, bearing serial number 524094; and 26 rounds of 9mm caliber ammunition.

Dated: January 10, 2024

THIS IS A TRUE BILL

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

s/Anthony P. Vance  
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s/William Orr  
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**Companion Case information MUST be completed by AUSA and initialed**

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	<b>Case Number</b>
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Case: 1:24-cr-20018
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge: Ludington, Thomas L.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	MJ: Morris, Patricia T.
	Filed: 01-10-2024

Case Title: USA v. Andrew Jasper AmesCounty where offense occurred: BayCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint []  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

Date: January 10, 2024

s/William Orr  
 William Orr  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.